

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT BECKLEY**

MATTHEW GIBSON,

Plaintiff,

v.

**Civil Action No. 5:21-cv-00181
Honorable Frank W. Volk**

**LOUISE E. GOLDSTON, individually,
COUNTY COMMISSION OF RALEIGH
COUNTY, a political subdivision, JEFF
MCPEAKE, individually, BRIAN WHITE,
individually, BOBBY STUMP,
individually,**

Defendants.

DEFENDANT LOUISE E. GOLDSTON' S PROPOSED VOIR DIRE

COME NOW the Defendant, Louise E. Goldston, by counsel, Jennifer E. Tully, Adam K. Strider, and the law firm of Bailey & Wyant, PLLC, and hereby submit the following proposed Voir Dire with regard to the jury selection in the above-referenced matter:

1. Is any member of the panel familiar with Matthew Gibson?
2. Is any member of the panel familiar with Judge Louise E. Goldston?
3. Is any member of the panel familiar with Deputy Jeff McPeake?
4. Is any member of the panel familiar with Deputy Brian White?
5. Is any member of the panel familiar with Deputy Bobby Stump?
6. Is any member of the panel familiar with John H. Bryan, or the Law Office of John H. Bryan?
7. Does any member of the panel follow The Civil Rights Lawyer Youtube Channel or

blog?

8. Does any member of the panel follow the Facebook Page of John H. Bryan, Attorney at Law?
9. Is any member of the panel familiar with Jennifer Tully, Adam Strider, or the law firm of Bailey & Wyant, PLLC?
10. Is any member of the panel familiar with Victor Flanagan, Kevin Robinson, or the law firm of Pullin, Fowler, Flanagan, Brown & Poe, PLLC?
11. Is any member of the panel familiar with or know anyone who is employed by or an elected official with the Raleigh County Commission?
12. Does any member of the panel know anyone who is employed by or regularly works with the Raleigh County Sheriff's Department?
13. Has any member of the panel ever been a party to a matter in the Family Court of Raleigh County?
14. Has any member of the panel ever been a party to a divorce proceeding?
15. Has any member of the panel ever had any negative interactions with the Court system?
16. Does any member of the panel believe that because of any negative interactions you have had with the Court system you cannot fairly weight the facts and evidence and render a fair and impartial verdict?
17. Has any member of the panel have a family member or close friend that has been involved in a contentious divorce?
18. Is any member of the panel a member of a militia organization or any anti-government group?

19. Does any member of the panel identify as a Sovereign Citizen or hold Sovereign Citizen beliefs?
22. Does any member of the panel hold negative beliefs about judges, police officers or law enforcement professionals that would make it difficult for you to render a verdict in their favor even if the evidence showed their actions to be justified?
23. Has any member of the panel viewed a video posted on YouTube by Mr. Bryan which portrays the home view by Judge Goldston at issue in this case, and provides text annotation and commentary by Mr. Bryan on the facts of the case and his beliefs about the law?
24. Is there any reason you could not render a verdict on behalf of a Judge if Plaintiff failed to prove his case by a preponderance of the evidence?